

**Exhibit A**

**Proposed Order**

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND  
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et*  
*al.*,

Debtors.<sup>1</sup>

PROMESA

Title III

No. 17 BK 3283-LTS

(Jointly Administered)

This filing relates to the  
Commonwealth and PBA.

**ORDER GRANTING FIVE HUNDRED SIXTY-FOURTH OMNIBUS OBJECTION  
(SUBSTANTIVE) OF THE COMMONWEALTH OF PUERTO RICO AND THE PUERTO  
RICO PUBLIC BUILDINGS AUTHORITY TO CLAIMS THAT ARE PARTIALLY  
SATISFIED AND/OR PARTIALLY ASSERT AMOUNTS FOR WHICH THE DEBTORS  
ARE NOT LIABLE**

*Upon the Five Hundred Sixty-Fourth Objection (Substantive) of the  
Commonwealth of Puerto Rico and the Puerto Rico Public Buildings Authority to Claims That Are  
Partially Satisfied and/or Partially Assert Amounts for Which the Debtors Are Not Liable (the*

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<sup>1</sup> The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (the "Commonwealth") (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority ("PBA", and together with the Commonwealth, COFINA, HTA, ERS, and PREPA, the "Debtors") (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations)

“Five Hundred Sixty-Fourth Omnibus Objection”)<sup>2</sup> of the Commonwealth of Puerto Rico (the “Commonwealth”), and the Puerto Rico Public Buildings Authority (“PBA,” and together with the Commonwealth, the “Objecting Debtors”), dated January 27, 2023, for entry of an order modifying and allowing certain claims filed against the Objecting Debtors, as more fully set forth in the Five Hundred Sixty-Fourth Omnibus Objection and supporting exhibits thereto; and the Court having jurisdiction to consider the Five Hundred Sixty-Fourth Omnibus Objection and to grant the relief requested therein pursuant to PROMESA Section 306(a); and venue being proper pursuant to PROMESA Section 307(a); and due and proper notice of the Five Hundred Sixty-Fourth Omnibus Objection having been provided to those parties identified therein, and no other or further notice being required; and the Court having determined that each of the claims identified in the column titled “Claims to Be Reduced and Allowed” in Exhibit A to the Five Hundred Sixty-Fourth Omnibus Objection (collectively, the “Claims to Be Reduced and Allowed”) has been partially satisfied and/or the Objecting Debtors otherwise have no liability for a portion of the claim, and that the remaining portion of the claim should be allowed; and the Court having determined that the relief sought in the Five Hundred Sixty-Fourth Omnibus Objection is in the best interest of the Objecting Debtors, its creditors, and all the parties in interest; and the Court having determined that the legal and factual bases set forth in the Five Hundred Sixty-Fourth Omnibus Objection establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor, it is

ORDERED that the Five Hundred Sixty-Fourth Omnibus Objection is GRANTED as set forth herein; and it is further

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<sup>2</sup> Capitalized terms not otherwise defined herein shall have the meanings given to such terms in the Five Hundred Sixty-Fourth Omnibus Objection.

ORDERED that the Claims to Be Reduced and Allowed are hereby modified and allowed as set forth in Exhibit A to the Five Hundred Sixty-Fourth Omnibus Objection; and it is further

ORDERED that Kroll is authorized and directed to modify and allow the amounts of the Claims to Be Reduced and Allowed set forth on the official claims register in the Title III Cases; and it is further

ORDERED that this Order resolves Docket Entry No. 23428 in Case No. 17-3283; and it is further

ORDERED that this Court shall retain jurisdiction to hear and determine all matters arising from or related to the implementation, interpretation, or enforcement of this Order.

SO ORDERED:

Dated: \_\_\_\_\_

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Honorable Judge Laura Taylor Swain  
United States District Judge

**EXHIBIT A**

**Schedule of Claims Subject to the Five Hundred Sixty-Fourth Omnibus Objection**

## Five Hundred Sixty-Fourth Omnibus Objection

## Exhibit A - Claims to Be Reduced and Allowed

ASSERTEDREDUCED AND ALLOWED

	NAME	CLAIM #	DEBTOR	PRIORITY STATUS	AMOUNT	DEBTOR	PRIORITY STATUS	AMOUNT
1	BIO NUCLEAR OF PR INC PO BOX 190639 SAN JUAN, PR 00919-0639	27254	Commonwealth of Puerto Rico	Unsecured	\$35,821.10	Commonwealth of Puerto Rico	Unsecured	\$35,354.26
Reason: Invoice(s) totaling \$466.84 were paid via check 00052154 on 06/27/2017. The Claimant shall retain the non-modified portion of the claim.								
2	CARIBBEAN CITY BUILDERS INC. PO BOX 2399 TOA BAJA, PR 00951	26628	Commonwealth of Puerto Rico	Unsecured	\$157,472.22	Commonwealth of Puerto Rico	Unsecured	\$24,631.84
Reason: Proof of Claim asserts invoices totaling \$157,472.22. The agency's records show a credit in the amount of \$132,840.38 has been applied, which resulted from the agency making excess payments from June 2015 - February 2016 to the asserted liabilities. The Claimant shall retain the non-modified portion of the claim.								
3	COMPREHENSIVE HEALTH SERVICE INC. PO BOX 367067 SAN JUAN, PR 00936-7067	47246	Commonwealth of Puerto Rico	Unsecured	\$627,923.67	Commonwealth of Puerto Rico	Unsecured	\$8,807.75
Reason: Invoice(s) totaling \$619,115.92 were paid via checks 83725, 83726, 83727, 83728, 90317, 90318, 90319, 90320, 92233, 92234, 92235, 92236, 95819, 95820, 95823, and 96765 between 05/30/2018 and 09/18/2018. The Claimant shall retain the non-modified portion of the claim.								
4	CONSOLIDATED WASTE SERVICES PO BOX 1322 GURABO, PR 00778	21614	Commonwealth of Puerto Rico	Unsecured	\$17,852.12	Commonwealth of Puerto Rico	Unsecured	\$1,308.78
Reason: Invoice(s) totaling \$16,543.34 were paid via checks 012332, 012401, and 012410 on 05/21/2018, 06/07/2018, and 06/12/2018. The Claimant shall retain the non-modified portion of the claim.								

## Five Hundred Sixty-Fourth Omnibus Objection

## Exhibit A - Claims to Be Reduced and Allowed

ASSERTEDREDUCED AND ALLOWED

	NAME	CLAIM #	DEBTOR	PRIORITY STATUS	AMOUNT	DEBTOR	PRIORITY STATUS	AMOUNT
5	GONZALEZ COLON, MARIA D 15 CALLE RAMON FLORES AIBONITO, PR 00705	18623	Commonwealth of Puerto Rico	Unsecured	\$45,900.00	Commonwealth of Puerto Rico	Unsecured	\$765.00
Reason: Invoice(s) totaling \$7,650.00 were paid via EFTs 197867, 201684, 201685, 201686, 201687, 201688, 273122, 273123, 273124, and 273166 between 07/17/2020 and 05/17/2021. Additionally proof of claim purports to assert liabilities associated with the Commonwealth of Puerto Rico, but liabilities totaling \$37,485.00 fail to provide sufficient supporting documentation for asserting the liabilities against the Commonwealth of Puerto Rico, such that the Debtors are unable to determine whether claimant has valid liabilities against the Commonwealth of Puerto Rico or any of the other Title III debtors. The Claimant shall retain the non-modified portion of the claim.								
6	GONZALEZ FIGUEROA, MONICA P O BOX 3874 AGUADILLA, PR 00605	61403	Commonwealth of Puerto Rico	Unsecured	\$29,004.00	Commonwealth of Puerto Rico	Unsecured	\$16,200.00
Reason: Proof of Claim purports to assert \$29,004.00 in liabilities associated with the Commonwealth of Puerto Rico, but fails to provide any basis or supporting documentation for liabilities totaling \$12,804.00 against the Commonwealth of Puerto Rico, such that the Debtors are unable to determine whether claimant has a valid claim against the Commonwealth of Puerto Rico or any of the other Title III debtors. The Claimant shall retain the non-modified portion of the claim.								
7	INTEGRATED BUILDING SOLUTIONS TECHNICAL GROUP CORP. PO BOX 6857 CAGUAS, PR 00726-6857	82390	Commonwealth of Puerto Rico	Unsecured	\$277,048.08	Commonwealth of Puerto Rico	Unsecured	\$51,414.90
Reason: Invoice(s) totaling \$225,633.18 were paid via checks 00114272, 00240269, 00073758, 00054933, 00048084, 00049829, and 00056132 on 03/08/2019, 04/17/2013, 03/13/2018, 07/24/2017, 05/23/2017, 05/30/2017, and 08/03/2017. The Claimant shall retain the non-modified portion of the claim.								

## Five Hundred Sixty-Fourth Omnibus Objection

## Exhibit A - Claims to Be Reduced and Allowed

ASSERTEDREDUCED AND ALLOWED

	NAME	CLAIM #	DEBTOR	PRIORITY STATUS	AMOUNT	DEBTOR	PRIORITY STATUS	AMOUNT
8	SANTOS OFFICE SUPPLY, INC. ATTN: XIOMARA SANTOS PRESIDENTE 55 CALLE ANTONIO R BARCELO CIDRA, PR 00739-3464	53697	Commonwealth of Puerto Rico	Unsecured	\$106,300.90	Commonwealth of Puerto Rico	Unsecured	\$15,560.35
Reason: Proof of Claim purports to assert \$90,543.04 in liabilities associated with the Commonwealth of Puerto Rico, but fails to provide any basis or supporting documentation for asserting a claim against the Commonwealth of Puerto Rico, such that the Debtors are unable to determine whether claimant has a valid claim against the Commonwealth of Puerto Rico or any of the other Title III debtors. Invoice(s) totaling \$197.51 fail to provide a basis for asserting a claim against Commonwealth of Puerto Rico. Proof of Claim and supporting documentation show liability between Claimant and University of Puerto Rico, which is not part of the Title III proceedings. The Claimant shall retain the non-modified portion of the claim.								
9	SES PEST CONTROL & SERV DBA R. SOLIVAN GONZALEZ URB REX MANOR A 16 CALLE 3 GUAYAMA, PR 00784	173899	Puerto Rico Public Buildings Authority (PBA)	Unsecured	\$9,999.98	Puerto Rico Public Buildings Authority (PBA)	Unsecured	\$4,999.99
Reason: Proof of Claim purports to assert \$9,999.98 in liabilities associated with the Puerto Rico Public Buildings Authority, but fails to provide any basis or supporting documentation for liabilities totaling \$4,999.98 against the Puerto Rico Public Buildings Authority, such that the Debtors are unable to determine whether claimant has a valid claim against the Puerto Rico Public Buildings Authority or any of the other Title III debtors. The Claimant shall retain the non-modified portion of the claim.								
10	THERAPY SOUTIONS LLC 452 AVE. PONCE DE LEON SUITE 515 SAN JUAN, PR 00918	23702	Commonwealth of Puerto Rico	Unsecured	\$76,053.63	Commonwealth of Puerto Rico	Unsecured	\$59,688.63
Reason: Invoice(s) totaling \$16,365.00 were paid via checks 00600509, 00620266, and 0052470 on 07/09/2015, 08/27/2015, and 07/06/2016. The Claimant shall retain the non-modified portion of the claim.								



## Proposed Order Page 9 of 9

Five Hundred Sixty-Fourth Omnibus Objection

Exhibit A - Claims to Be Reduced and Allowed

ASSERTEDREDUCED AND ALLOWED

	NAME	CLAIM #	DEBTOR	PRIORITY STATUS	AMOUNT	DEBTOR	PRIORITY STATUS	AMOUNT
11	UNIVERSAL CARE CORPORATION PO BOX 1051 SABANA SECA, PR 00952-1051	19242	Commonwealth of Puerto Rico	Unsecured	\$71,481.34	Commonwealth of Puerto Rico	Unsecured	\$52,365.13

Reason: Invoice(s) totaling \$1,731.00 were paid via Checks between 05/24/2018 and 01/10/2019. Additionally proof of claim purports to assert liabilities associated with the Commonwealth of Puerto Rico, but liabilities totaling \$2,876.21 fail to provide sufficient supporting documentation for asserting the liabilities against the Commonwealth of Puerto Rico, such that the Debtors are unable to determine whether claimant has valid liabilities against the Commonwealth of Puerto Rico or any of the other Title III debtors. The Claimant shall retain the non-modified portion of the claim.

Claim #19242 also contained on Exhibit A to the 391st Omnibus Claims Objection for Modified Claims.